

MAR 17 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)	DOCKET NO. 3:21-cr-86-FDW
)	
)	<u>BILL OF INDICTMENT</u>
v.)	
)	Violation: 26 U.S.C. § 5861(d)
)	26 U.S.C. § 5871
ARBAB SALEEM)	
_____)	

THE GRAND JURY CHARGES:

COUNT ONE

*(Possession of a Firearm Not Registered in the National Firearms Registration
and Transfer Record)*

On or about April 7, 2020, in Mecklenburg County, within the Western District of North Carolina, the defendant,

ARBAB SALEEM,

knowingly possessed a firearm, that is, a weapon made from a shotgun, to wit, a Stevens, Model 94, 16 gauge shotgun, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 18 U.S.C. Sections 921(a)(6), and Title 26, United States Code, Sections 5845(a)(2), 5861(d), and 5871.

COUNT TWO

*(Possession of a Firearm Not Registered in the National Firearms Registration
and Transfer Record)*

On or about April 7, 2020, in Mecklenburg County, within the Western District of North Carolina, the defendant,

ARBAB SALEEM,

knowingly possessed a firearm, that is, a firearm silencer, modified from an metal cylindrical device, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 18 U.S.C. Sections 921(a)(3)(C) and 921(a)(24), and Title 26, United States Code, Sections 5845(a)(7), 5861(d), and 5871.

COUNT THREE

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about April 7, 2020, in Mecklenburg County, within the Western District of North Carolina, the defendant,

ARBAB SALEEM,

knowingly possessed a firearm, that is, an any other weapon, a manufactured AR-15 type .223 Remington caliber firearm, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 18 U.S.C. Sections 921(a)(3)(A) and 921(a)(3)(B), and Title 26, United States Code, Sections 5845(a)(5) and 5845(e), 5861(d), and 5871.

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given of 18 U.S.C. § 924 and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 924 and/or Section 2461(c): all firearms involved or used in the violations set forth in this bill of indictment.

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a. one (1) Stevens, Model 94, 16 gauge shotgun;
- b. one (1) metal cylindrical device/silencer; and
- c. one (1) any other weapon/manufactured AR-15 type .223 Remington caliber firearm.

A TRUE BILL

WILLIAM T. STETZER
ACTING UNITED STATES ATTORNEY



JENNIFER LYNN DILLON
ASSISTANT UNITED STATES ATTORNEY